

**EPA's Response to the Peer Review Comments
(dated January 19, 1998) on the State's Proposed Garcia River Watershed Water Quality
Attainment Strategy dated December 9, 1997**

**Part 3
March 16, 1998**

As part of the development of its Strategy, the State requested a peer review of the draft Strategy and accompanying documents (Assessment of Aquatic Conditions in the Garcia River Watershed and Staff Report on the proposal to include a water quality attainment strategy for the Garcia River watershed into Section 4, Nonpoint Source Measures, of the Water Quality Control Plan for the North Coast Region.). These documents were reviewed by Dr. William Dietrich, Department of Geology and Dr. Mary Power, Department of Integrative Biology, University of California, Berkeley.

The peer review was not submitted to EPA as a comment, but was provided to EPA by the State at EPA's request. Although this peer review was directed towards the State's Strategy and accompanying documents, and EPA has no legal obligation to respond to this review, EPA did consider the peer review and provides the following responses to the general concerns raised by the peer reviewers. In addition, where peer-review comments refer to the State's implementation and monitoring plan, EPA will consider these further as EPA continues to review the State's implementation and monitoring measures being developed in the State's Strategy.

1. Current knowledge about the status of the Garcia is spotty and causality is not well established.

RESPONSE: EPA agrees. Nevertheless, EPA believes that the State and EPA TMDL documents relied on the best available information and methodology to develop the TMDLs.

2. Given the critical state of the coho, the land use prescriptions do not seem restrictive enough to insure recovery of the system.

RESPONSE: While EPA supports the State's implementation strategy, EPA will be reviewing it in more detail and will be continuing to assess whether it is protective enough of the beneficial uses and will result in attainment of the TMDL.

3. Monitoring targets (particularly with regard to sediment yield) may be difficult to quantify reliably.

RESPONSE: EPA agrees. That is why EPA supports the State's proposed phased approach to this TMDL in order to provide for long term monitoring and adaptive management.

4. The monitoring plan (design, execution and analysis) should not be left to non-specialists

(even those with some partial training).

RESPONSE: EPA agrees. EPA expects the State and landowners to use qualified people in implementing a monitoring plan.

5. The proposed policy regarding gravel mining - permitting continued extraction at some estimated rate of delivery - normally leads to significant downstream degradation, and I doubt that the Garcia is any different from rivers which have severely degraded as a consequence.

RESPONSE: This comment deals with the State's implementation plan. The State will consider all the peer-review comments as it continues to refine its Strategy, including the implementation plan.